

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION**

DAVID A. STEBBINS

PLAINTIFF

v.

NO. 4:16-CV-545-JM

**STATE OF ARKANSAS, ARKANSAS
REHABILITATION SERVICES, AND
AMY JONES**

DEFENDANT

**MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFF'S DISCOVERY REQUESTS**

For their Motion for Extension of Time to Respond to Plaintiff's Discovery Requests, Defendants the State of Arkansas, Arkansas Rehabilitation Services, and Amy Jones state:

1. On January 10, 2017, the Office of the Arkansas Attorney General received Plaintiff's Requests for Production and Requests for Admissions. (DE 37-1)
2. That same day, Assistant Attorney General Amber Schubert filed a Motion to Stay Discovery. Defendants' motion was granted on January 26, 2017, pending a ruling on Defendants' Motion to Dismiss. (DE 44)
3. On July 27, 2017, this Court granted in part, and denied in part, Defendants' motion. (DE 55)
4. As such, Defendants believe their responses to Plaintiff's discovery are due on Monday¹, August 28, 2017.

¹ 30-days from the Order would be August 26, 2017; however, August 26th falls on a Saturday.

5. The Defendants are working to respond to Plaintiff's discovery requests. However, due to the volume and scope of Plaintiff's discovery requests, additional time is needed to respond.

6. Accordingly, Defendants request up to and including September 26, 2017 (30 additional days) to respond to Plaintiff's discovery requests.

7. Defendants respectfully request that their time to respond include time to raise proper objections to any of Plaintiff's requests.

8. The undersigned has conferred with the Plaintiff, today, via email. It is not clear whether the Plaintiff opposes the Defendants' motion or not.

9. The discovery deadline in this matter is set for January 12, 2018; therefore, the Plaintiff will not suffer undue prejudice by this extension of time.

WHEREFORE, for good cause shown, the Defendants request that the Court grant their Motion and permit them to respond to Plaintiff's discovery requests by September 26, 2017.

Respectfully submitted,

Leslie Rutledge
Attorney General

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CERTIFICATE OF SERVICE

I, Christine A. Cryer, Senior Assistant Attorney General, do hereby certify that on August 25, 2017, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system.

I, Christine A. Cryer, hereby certify that on August 25, 2017, I mailed the document by U.S. Postal Service to the following non CM/ECF participant:

Mr. David Stebbins
123 W. Ridge St., Apt. D
Harrison, Arkansas 72601

/s/ Christine A. Cryer